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REMARKS

Applicant has carefully reviewed the Office Action dated June 15, 2004. Claims 1-7 are pending in this application. Applicant has amended Claims 1, 2, 3, 4, 6 and 7 to more clearly point out the present inventive concept. Reconsideration and favorable action is respectfully requested.

Claim 7 stands rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. The Examiner has specifically asked Applicant to point to the sections that support this claim. This particular claim pertains to the operation of erasing the user space. This is described at p. 23, beginning at line 5 to line 9. Therein, it is described that erasing the user space lock byte is done by erasing one logical block of memory at a time beginning at the lower end thereof until the user lock byte 1108 is erased. Further, this is described with respect to FIGURE 15, wherein it can be seen that the counter is incremented up until the counter "exceeds" the limit, the limit being that portion of the memory where the lock byte is stored. Therefore, lower portions of the memory that have no lock bytes contained therein will be erased until the lock byte itself is erased, at which time the counter will be terminated. Therefore, Claim 7 is supported wherein it sets forth that erasing of a lock "bit" requires that the lower logical portions of the memory with a lower logical memory address not containing lock bits be erased before the top most portion of the memory having a relatively higher logical address be erased, which top most portion of the memory contains the lock bits. This last portion of the claim refers to the limit. Thus, Applicant believes that the specification clearly supports this claim. Therefore, Applicant respectfully requests the withdrawal of the 35 U.S.C. §112 rejection with respect to Claim 7.

Claims 1-7 stand rejected under 35 U.S.C. §102(b) as being anticipated by *Hotley*, U.S. Patent No. 5,442,704. This rejection is respectfully traversed with respect to amended claims.

Claim 1 has been amended to further clarify the previous language in that the predetermined memory access operation is a predetermined "type of" memory access operation. The Examiner noted that the term "predetermined" preceding the term "memory access" does not necessarily refer to a type
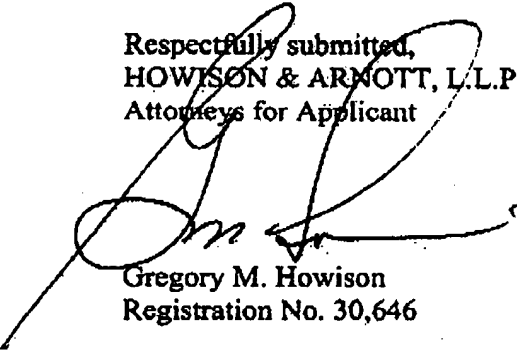
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of operation. However, it is the association of a memory access operation with the lock portion that is the subject of the step of comparing. This is not illustrated in *Hotley*. Applicant believes that this should clarify the prior response from Applicant in which Applicant set forth that "However, there is no disclosure or suggestion that each block will have a single bit associated therewith which will be associated with a *particular memory access operation*." Applicant believes that this argument was addressed toward the type of operation as opposed to any operation. As such, Applicant believes that the claims as amended and as further clarified, distinguish over the *Hotley* reference and, therefore, Applicant respectfully requests the withdrawal of the 35 U.S.C. §102 rejection with respect to Claims 1-7.

Applicant has now made an earnest attempt in order to place this case in condition for allowance. For the reasons stated above, Applicant respectfully requests full allowance of the claims as amended. Please charge any additional fees or deficiencies in fees or credit any overpayment to Deposit Account No. 20-0780/CYGL-24,692 of HOWISON & ARNOTT, L.L.P.

Respectfully submitted,
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AMENDMENT AND RESPONSE
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